Remarks

Reconsideration and allowance of the above referenced application are respectfully requested.

Initially, claims 1-3, 5, 19, 26 and 28-32 stand rejected under 35 USC 112, second paragraph, as allegedly being indefinite. In response, certain claims are amended herewith. Initially, the objection to the "such... locations" is respectfully traversed. The claim states that there is "controlling" of said reflector elements using multiple digital bits." The claim also states that "each change of each single digital bit changes the location where said output beam is directed". The location where the output beam is directed is "to at least one of multiple different spaced locations, the one of the spaced locations where the beam is directed being based on states of the multiple bits". This is entirely definite as stated, since it recites that the reflector elements change the location where the beam is directed to one of multiple different spaced locations. The rejection that this is "nonsensical" is therefore respectfully traversed.

The objection to claim 1 line 11 is well taken, and the word "said" has been deleted.

Claim 19 has been amended to obviate the lack of clarity.

Claim 30 has been amended to remove the obvious typographical error. The first word "series" has also been

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changed to "plurality", to obviate issues from the dual uses of this word.

Claims 1-3 and 31 stand rejected under 35 USC 102b as allegedly being unpatentable over Leddy, et al. Claim 5 stands rejected over Leddy, et al. in view of Lin, et al. With all due respect, these contentions are respectfully traversed.

In order to demonstrate the patentability, the scope and contents of the prior art will first be described as suggested by Graham v. John Deere. First, Leddy, et al. teaches an image simulation system using a DMD. The DMD produces an image on the screen 21. As explained in column 5 beginning line 18, each mirror represents one pixel of the image, and the image itself is formed of multiple images. An array of mirrors is formed, for example a 1080 x 1920 array, see column 5 line 46. An image is projected using this array see generally column 5 beginning line 64. Column 6 beginning at line 59 explains that a typical DMD uses an image shifted onto the chip, but that the elements of the DMD can be addressed one pixel at a time. However, this is done in the context of displaying an entire image. Nowhere is there any teaching or suggestion in Leddy, et al. that the position of the image is ever changed. Therefore, a difference between the prior art in the claims at issue is that the prior art changes the content of the scene, but not its position. The position of the scene in Leddy, et al. is always in exactly the

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same location. Claim 1, in contrast, states that the optical beam is directed "to at least one of multiple different spaced locations" and that "the one of the spaced locations where the beam is directed being based on states of the multiple bits" where the multiple bits are the bits that control the reflector elements. Another words, claim 1 requires that the beam is sent to a number of different locations and those different locations are dependent on the digital bits. Leddy, et al. changes the content of the scene based on those digital bits, but it is always at exactly the same location. Claim 1 is thus inherently different from Leddy, et al., and as such should be patentable thereover.

Claim 5 is rejected based on Leddy, et al. in view of Lin, et al. However, claim 5 should be allowable by virtue of its dependency, and even if Lin, et al. shows exactly what the rejection says, it still would not render obvious these claims.

Claims 19, 26 and 28-32 were not rejected over any of the art in the case, and hence should be allowable now that the rejections under section 112 have been obviated.
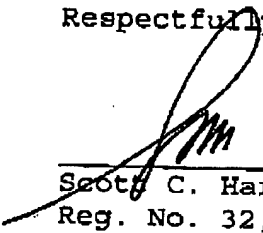
It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be

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exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicant asks that all claims be allowed. It is believed there is no fee due, however, please apply any other charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

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